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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
PROFESSIONAL OFFSHORE  
OPPORTUNITY FUND, LTD., a company : 08-CIV-5643 (SAS)  
registered under the laws of the British Virgin  
Islands, :  
Plaintiff, : **NOTICE OF**  
-against- : **MOTION FOR DEFAULT**  
AMEREX GROUP, INC., a Delaware : ECF CASE  
corporation, :  
Defendant. :  
:  
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**PLEASE TAKE NOTICE THAT** plaintiff Professional Offshore Opportunity Fund,  
Ltd., by its undersigned counsel, Sullivan & Worcester LLP, moves this Court for entry of  
default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure against  
defendant Amerex Group, Inc.

**PLEASE TAKE FURTHER NOTICE THAT** plaintiff submits a memorandum of law  
and the Declaration of Gretchen S. Silver in support of its motion.

**PLEASE TAKE FURTHER NOTICE THAT** plaintiff also submits a proposed default  
judgment.

**PLEASE TAKE FUTHER NOTICE THAT** plaintiff served this motion by overnight courier on Amerex Group, Inc., to the attention of Nicolas Malino, at 1105 N. Peoria Avenue, Tulsa, Oklahoma 74106.

Dated: New York, New York  
July 24, 2008

SULLIVAN & WORCESTER LLP

By: /s/  
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*Attorneys for Plaintiff Professional Offshore Opportunities Fund, Ltd.*